

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

GWACS ARMORY, LLC,)
Plaintiff,)
vs.) Case Number
KE ARMS, LLC, RUSSELL PHAGAN,) 20-cv-0341-CVE-SH
SINISTRAL SHOOTING,) BASE FILE
TECHNOLOGIES, LLC, BROWNELLS,) Consolidated with:
INC., and SHAWN NEALON,) Case No.
Defendants.) 21-CV-0107-CVE-JFJ
and)
KE ARMS, LLC,)
Plaintiff,)
vs.)
GWACS ARMORY, LLC, GWACS)
DEFENSE INCORPORATED, JUD)
GUDGEL, RUSSELL ANDERSON, DOES)
I through X, and ROE)
CORPORATIONS I through X,)
Defendants.)

THE DEPOSITION OF SHAWN NEALON,
taken on the 25th day of October, 2021, between the hours
of 9:29 a.m. and 12:46 p.m., on behalf of the Plaintiff
GWACS, pursuant to Federal Rules of Civil Procedure, at
the law offices of Hall, Estill, Hardwick, Gable, Golden &
Nelson, 320 South Boston Avenue, Suite 200, Tulsa,
Oklahoma, before Linda Fisher, CSR-RPR, and Notary Public
in and for the State of Oklahoma.

1 Q. Were there designs for the CAV-15 on the CD --
2 I'm sorry, on the thumb drive that you gave them?

3 A. I don't know. I wasn't able to open the files.
4 I didn't have the proper software to open them. I also
5 cautioned them that whatever computer they put that thumb
6 drive in, to make sure it wasn't connected to their
7 network, because I had no idea if it was riddled with
8 viruses or whatever.

9 Q. Okay. So you sold them a CAD -- CAM file on a
10 thumb drive and you had no idea what was on it?

11 MR. CALAWAY: Objection.

12 A. I didn't have a --

13 MR. CALAWAY: Objection. Object to the
14 question. Asked and answered. Go ahead.

15 A. Okay. I no longer owned the computers or any
16 of the stuff that I could really open these files and
17 manipulate them or do anything with. I didn't currently
18 own any CAD or CAM software. So last time I had opened
19 the files was, like, shit, 2008, 2006, something like
20 that. And they were there.

21 Mostly what they were interested in were the stuff
22 that was left over from Accumatch, block pistol barrels,
23 extended pistol barrels with suppressors, muzzle brakes.
24 A lot of the prints and stuff covered a lot of pistol
25 parts. That was mostly what they were looking at.